



VIA ECF

April 12, 2021

The Honorable Alison J. Nathan
United States District Court (S.D.N.Y.), Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *Republic of Turkey v. Christie's Inc., et al.*, 17 Civ. 3086 (AJN)

Dear Judge Nathan:

The parties have conferred regarding Defendants' sealing requests for certain trial exhibits introduced by Plaintiff on April 9. Defendants have proposed, and Plaintiff has agreed to, narrowly tailored redactions for the following:

- PTX 172, PTX 196, PTX 199, PTX 200, PTX 305: Redactions reflect post-1993 transactions to protect Mr. Steinhardt's privacy. The redactions also include identifying information for objects acquired by Mr. Steinhardt in or before 1993, including images of the works, titles, location, source, and insurance value.

These sealing requests are narrowly tailored and are appropriate because (1) these are the types of documents concerning a private collection ordinarily expected to be kept private, and (2) disclosure might expose Mr. Steinhardt to security risks and public scrutiny of his private affairs beyond what is necessitated by this case. Moreover, the Court stated that post-1993 transactions are not relevant and that they will not be considered.

- With respect to PTX 267, the parties have agreed to limited redactions to protect the bespoke details of the Christie's-Steinhardt Seller's Agreement. These redactions include personal information and individualized terms specifically tailored to the Idol transaction.

Defendants understand that Plaintiff will submit these documents to the Court with the agreed redactions.

Respectfully submitted,

/s/ Thomas R. Kline
Thomas R. Kline
Attorneys for Defendants